

UNITED STATES DISTRICT COURT

for the

District of _____

Jackson Ray _____ Division
 Kiowa Nativeida
 David Forsyth.
 SABIN MOIR
 JUSTIN PLEVETT
 Plaintiff(s)

) Case No. 6:25-cv-00775-AN
)
) (to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing this complaint.
 If the names of all the plaintiffs cannot fit in the space above,
 please write "see attached" in the space and attach an additional
 page with the full list of names.)

-v-

MARION COUNTY JAIL
 SHERIFF NICK Hunter

Defendant(s)

(Write the full name of each defendant who is being sued. If the
 names of all the defendants cannot fit in the space above, please
 write "see attached" in the space and attach an additional page
 with the full list of names.)

Jury Trial: (check one) Yes No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address

Jackson Ray
 4000 HUNSVILLE Highway
 Salem MARION COUNTY
 Oregon 97317

All Plaintiff same
 address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

~~Marion County Jail~~
 Sheriff Mark Hunter
 4000 Ronville Highway
 Salem Marion
 Oregon 97717

Defendant No. 2

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Ramsey
 Jail Commander
 4000 Ronville Highway
 Salem Marion
 Oregon 97317

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Deputy Danielson
 Jail Deputy
 4000 Ronville Highway
 Salem Marion
 OR 97317

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Aione Mba
 Jail Deputy
 4000 Ronville Highway
 Salem Marion
 Oregon 97317

1 Plaintiff No. 4 Carlos V Cadenas
2 Name 16734232

3 Job title

4 City & Country

5 State & ZIP

6 Phone Number

7 E Mail

8 Plaintiff No. 5

9 Name

10 Job title

11 City & Country

12 State & ZIP

13 Phone Number

14 E Mail

15 Plaintiff No. 6

16 Name

17 Job title

18 City & Country

19 State & ZIP

20 Phone Number

21 E Mail

22

23

24

25

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1 Plaintiff no.1

2 Name: Jassan Ray

3 Job title: Plaintiff

4 Street address: 4000 Aumsville Hwy Salem, OR, 97317

5 City & country: Salem, Marion

6 State & Z.P code OR, 97317

7 Phone Number

8 Email

9 Plaintiff no.2

10 Name: ~~President~~ Justin Plutte

11 Job title: Plaintiff

12 Street address: 4000 Aumsville Hwy Salem, OR, 97317

13 City & country: Salem, Marion

14 State & Z.P : OR, 97317

15 Phone number

16 Email

17 Plaintiff No.3

18 Name: Thowor Maviddad

19 Job title Plaintiff

20 Street address: 4000 Aumsville Hwy Salem, OR, 97317

21 City & country: Salem, Marion

22 State & Z.P : OR, 97317

23 Phone number

24 Email

25

26

27

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II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

CIVIL RIGHTS 1983 CLASS ACTION
Rule: ADA VIOLATIONS - PRETRIAL
DETAINMENT VIOLATIONS OF 14TH AMENDMENT
RIGHTS 81

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the _____ State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____ and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____ (foreign nation) _____ Or is a citizen of _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under _____, and has its
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

2.5 million dollars up to 40
 million not to exceed 40 million
 But no less than 2.5 million
 per every 5 plaintiffs.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In Marion County Jail all plaintiffs have been placed on max custody due to mental health issues for extended amount of time none of these individuals have shown any behavioral issues in weeks we are allotted 1 hr out at AM, and 1 hr out of PM when two staff are available custody staff continue to not give us our hr out in the evenings because we are max custody even when there is enough staff covering irreversible damage to our mental health this is an ongoing cruel & unusual situation.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

We are asking that the federal government takes receivership for Marion County Jail & its deputies for the negligence that has gone on here, irreversible damages caused by the keeper we are asking that #2.5 million be split between all plaintiff for the abusive punishment by this Sheriff & his deputies for every 5 plaintiff added, add #2.5 million Not to exceed \$40 million dollars

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

1/24/25

Signature of Plaintiff



Printed Name of Plaintiff

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Att of claim REV # 2 on 4/25/25 at 4:15 pm
Dep - patterson-stealing delivered my AIC
Guidance form to exhort my Appeal process &
remedys concerning this whole Civil Rights
complaint without a defacties signature which
is why they say they voided it although I
turned it in directly to deputy "AIC" who
is also a defactent in this case this is
gross & Malicious activities by several deputies
to stop my Guidance plusses & my lawsuits
This should Justify Immediate Interception
by the federal government to take over control
to stop further gross Negligent misconduct
in the least I Impose the us magistrate to find
in favor of all the plaintiff for this over whelming
bulden of proof of severe misconduct of our
14th amendment Right of pre trial detainees



AIC GRIEVANCE FORM

INSTRUCTIONS: Follow the rules in the AIC Handbook regarding the facility's grievance procedures. Fill in the blanks in the first two sections. If you need more room, use additional sheets of paper, not additional grievance forms. If you want to grieve more than one issue, use a grievance form for each issue.

Reason for Grievance (Check One):

- () Conditions of Confinement () Medical Care () General Classification Procedures
 () Participation in AIC Programs () Religious Practices () Telephone, Mail & Visiting Procedures
 () Prison Rape Elimination Act-PREA () Food Service () AIC Trust Accounts

AIC's Name: Jason Ray SID: 11961959 Cell: C-1-204B

Grievance: On 4-18-25 Officer Danner refused to give inmates our time out in the evening. Although he gave non max inmates time out of their cells - 30 min. max inmates get 1 hour in the morning and one hour in the evening. Date / Time: 4-18-25, 7:05 PM

AIC Signature:

Receiving Deputy Signature: # Date / Time:

Deputy's Response:

This grievance is being voided because it lacks a deputy signature.

Deputy's Signature: # Date / Time:

Acceptance of Resolution of Grievance: Date / Time:

AIC's SIGNATURE

Supervisor's Review:

Date / Time Received:

Supervisor's Signature: # Date / Time:

Acceptance of Resolution of Grievance: Date / Time:

AIC's SIGNATURE

Administrator's Review:

Date / Time Received:

Administrator's Signature: # Date / Time:

Acceptance of Resolution of Grievance: Date / Time:

AIC's SIGNATURE

Continue of # 10336

OFFICER DANIELSON PURPOSEFULLY
Did not let max pc
out there is 2 OFFICERS
there is no reason
we should not get
over time out.

this can constitute
IRREDEEMABLE DAMAGE &
caused at the hands
OF a keeper also
CRUEL and UNUSUAL
Punishment by a
Deputy Sheriff who has
Power over an individual
Deputy Danielson to be
Retrained and a
permanant DISCIPLINARY

note ABOUT HIS conduct
towards AIC's in his
permanant FILE: ALSO
possible MONITORLY consequences
IF this cannot be resolved

Thank you

ALSO VENUE D UNIT IS NOT
AN EXCEPTIBLE ANSWER when
there is enough STAFF to
Run max pc well Right now
IS 7 inmates.

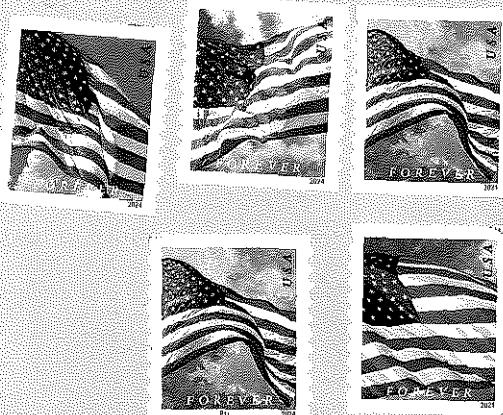
Statement of claim
Att 2nd 1st for 2nd named

We want to show pressidenece of how corrupt Marion county sheriff is plaintiff Natividad spent 30 days on 22 hr lockdown with severe mental health issues most days 23-24 due to "not enough staff" a lot of the time most of ssh inmates are locked down 23/24 hrs a day with no access to our family/lawyers/mental health staff inmate Natividad went before classification staff member Dianardo ~~at~~ classification staff extended his max 15 days because he was given the wrong food and he "calmly" asked for the right food which is not a behavioral issue, as we are instructed to do just that with issues for our clothing, food, mail classification Dianardo did not read the file just saw there was notes of Natividad "calmly" talking with staff and re-classed him without reason every plaintiff has been bounced from classification they are where housing inmates with no treatment.

Emergency Relief

the plaintiffs in said cause come before you and ask the federal gov to force federal receivership & take custody of Marion County Jail, 11 people with mental health issues have died or had serious ^{injuries} in the last 6 months this lockdown is causing severe mental anguish and irreversable damage. we are pre-trial detainees & have not been convicted of a crime. It is the job of the sheriff & deputies to make sure beyond a reasonable doubt that our safety, security & mental health are taken care of which are grossly miss handled.

Name: Tayfour Ray
SID# 119101959
LEGAL/OFFICIAL MAIL ONLY
Marion County Sheriff's Office Jail
4000 Aumsville Hwy SE
Salem, OR 97317



US District Court
Office of the Clerk
Sub 730
1000 SW Third Ave
Portland OR 97204

10F2

